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11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION

14
15 UNITED STATES OF AMERICA,) CASE NO. 20-CV-07811-RS
16 Plaintiff,)
17 v.)
18 Approximately 69,370 Bitcoin (BTC), Bitcoin)
Gold (BTG), Bitcoin SV (BSV), and Bitcoin)
19 Cash (BCH) seized from)
1HQ3Go3ggs8pFnXuHVHRytPCq5fGG8Hbhx;)
20 Defendant.)
21
22

23 IT IS HEREBY STIPULATED by and between plaintiff United States of America and potential
24 claimant Ross William Ulbricht ("Ulbricht", collectively the "parties"), through their respective counsel
25 of record, to compromise and settle their interests in the following described property (the "Subject
Property"):

26
27 a. Approximately 69,370 Bitcoin (BTC), Bitcoin Gold (BTG), Bitcoin SV (BSV), and
28 Bitcoin Cash (BCH) seized from 1HQ3Go3ggs8pFnXuHVHRytPCq5fGG8Hbhx.

STIPULATION TO FORFEITURE

1
2 1. On or about November 20, 2020, plaintiff filed its amended complaint seeking forfeiture
3 of the subject property. Docket No. 8.

4 2. On June 3, 2015, the United States District Court for the Southern District of New York
5 entered a Preliminary Order of Forfeiture/ Money Judgment against Ulbricht in United States v. Ulbricht,
6 SI 14 Cr. 68 (KBF) (the "Money Judgment").

7 3. The parties agree that the resolution of this potential claim is based solely on the terms
8 stated in this Settlement Agreement. It is expressly understood that this Agreement has been freely and
9 voluntarily entered into by the parties. The parties further agree that there are no express or implied
10 terms or conditions of settlement, whether oral or written, other than those set forth in this Agreement.
11 This Agreement shall not be modified or supplemented except in writing signed by the parties. The
12 parties have entered into this Settlement Agreement in lieu of continued protracted litigation and District
13 Court adjudication.

14 4. Ulbricht hereby agrees that the Subject Property is subject to forfeiture pursuant to 18
15 U.S.C. §§ 981(a)(1)(A), 981(a)(1)(C), 981(b), and 21 U.S.C. § 881(a)(6). Ulbricht withdraws any claim
16 and stipulates to the forfeiture of the Subject Property to the United States (administrative or judicial,
17 civil or criminal) without further notice to him. Ulbricht further relinquishes all right, title and interest in
18 the Subject Property and agrees that said property shall be forfeited to the United States and disposed of
19 according to law by the United States. Ulbricht agrees not to assist any other individual or entity in any
20 effort to contest this forfeiture. Ulbricht further waives all constitutional and statutory challenges in any
21 manner (including direct appeal, habeas corpus, or any other means) to any forfeiture carried out in
22 accordance with this Agreement on any grounds, including that the forfeiture constitutes an excessive
23 fine or punishment, and including any statute of limitations.

24 5. The parties agree that the net proceeds realized from the sale of the Subject Property
25 forfeited pursuant to this agreement shall be credited toward any unpaid balance of the Money Judgment.

26 6. Ulbricht, his heirs, representatives and assignees, agree to hold harmless the United States,
27 any and all agents, officers, representatives and employees of same, including all federal, state and local
28 enforcement officers, for any and all claims, defenses, actions, or liabilities arising out of or related to

1 this action against the Subject Property.

2 7. The parties agree that each party shall pay its own attorneys' fees and costs.

3
4 IT IS SO STIPULATED:

5
6 Dated: 1/22/2021



7 ROSS WILLIAM ULRICH
8 Potential Claimant

9 DATED: 1/28/2021



10 DAVID A. WARRINGTON, ESQ.
11 Attorney for Potential Claimant

12 DATED: 2/3/21

13 /S David Countryman

14 DAVID COUNTRYMAN
15 Assistant United States Attorney